

**REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed July 15, 2004. Applicants appreciate the Examiner's consideration of the Application. Claims 1 and 12 have been amended to clarify, more particularly point out, and more distinctly claim inventive concepts previously present in these claims. Applicants make no admission that these amendments narrow the scope of the claims or that the amendments are required for patentability. Applicants respectfully submit that no new matter has been added by the amendments to the claims. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case. .

**Applicants' Summary of Interviews**

Applicants thank the Examiner for the courtesy and opportunity to conduct a telephone interview on July 9, 2004. The final rejection was discussed. No agreement was reached.

Applicants thank the Examiner for the courtesy, opportunity, and patience to conduct another telephone interview on July 14, 2004. Applicants noted that the Examiner modified the rejection of Claims 1, 4-12, and 15-22 based upon changes set forth in the Response Accompanying Request for Continued Examination, mailed April 8, 2004, and requested that the Examiner withdraw the finality of the rejection. The Final Office Action mailed May 18, 2004, was withdrawn and replaced with the Office Action mailed July 15, 2004.

**Section 103(a) Rejection**

The Examiner rejects Claims 1, 4-12, and 15-22 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,058,380 to Anderson et al. ("*Anderson*") in light of U.S. Patent No. 5,926,810 to Noble et al. ("*Noble*"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that the combination of *Anderson* and *Noble* as suggested by the Examiner fails to disclose, teach, or suggest elements specifically recited in Applicants' claims. For example, the *Anderson-Noble* combination fails to disclose, teach, or suggest the following:

- (1) “a first accounts payable item being associated with a first cost, the first cost represented in a first currency, a second accounts payable item being associated with a second cost, the second cost represented in a second currency”;
  - (2) “converting the first cost from the first currency to a global currency”; and
  - (3) “converting the second cost from the second currency to the global currency”
- (recited in Applicants’ independent Claim 1, as amended).

*Anderson* discloses a method and system for processing invoice information. (*Anderson*, Abstract.) According to *Anderson*, an intermediary can use the *Anderson* invention to pay a vendor by any of a variety of methods on a due date. (*Anderson*, column 2, lines 23-34.) An invoice analyzer retrieves invoices and evaluates each invoice, for example, by performing a reasonability check. The analyzer assigns a status to an invoice as to payment along with explanatory information, based upon analysis criteria that the customer has established for the account corresponding to the invoice. (*Anderson*, column 6, lines 2-9.) An invoice reviewer displays each invoice, at which time the customer can enter directions for payment by reviewing and approving, modifying and approving, rejecting, or taking no action on each invoice. (*Anderson*, column 8, lines 52-56.) Based upon payment instructions, a payment generator formats, generates, and transmits to an EDI translator appropriate payment instructions. (*Anderson*, column 10, lines 9-14.)

*Anderson*, however, fails to disclose, teach, or suggest any type of currency conversion. Accordingly, *Anderson*, however, fails to disclose, teach, or suggest “converting the first cost from the first currency to a global currency,” or “converting the second cost from the second currency to the global currency,” as recited in amended Claim 1.

*Noble* discloses a system and method for accessing an altered database architecture using existing code. (*Noble*, Abstract.) *Noble* describes certain accounts payable features. (See, e.g., *Noble*, column 8, lines 33-39, 49-53; column 10, lines 39-43; column 10, line 64-column 11, line 4; column 11, lines 58-61.)

*Noble*, however, fails to disclose, teach, or suggest any type of currency conversion. Accordingly, *Noble*, fails to disclose, teach, or suggest “converting the first cost from the first currency to a global currency,” or “converting the second cost from the second currency to the global currency,” as recited in amended Claim 1. Thus, the *Anderson-Noble* combination suggested by the Examiner fails to disclose the elements specifically recited in Applicants’ independent Claim 1.

Applicants' dependent claims are allowable based on their dependence on the independent claim and further because they recite numerous additional patentable distinctions over the references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claim over the references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claim 1, together with its dependent claims.

Independent Claim 12 recites certain limitations substantially similar to those recited in independent Claim 1. Accordingly, for at least the same reasons, Applicants also respectfully request reconsideration and allowance of independent Claim 12, together with its dependent claims.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 05-0765 of Electronic Data Systems Corporation.

Respectfully submitted,

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